

Exhibit 6

GIDEON, COOPER & ESSARY

A PROFESSIONAL LIMITED LIABILITY COMPANY

315 DEADERICK STREET, SUITE 1100

NASHVILLE, TENNESSEE 37238

(615) 254-0400

FAX (615) 254-0459

www.gideoncooper.com

C. J. GIDEON, JR.¹
DIXIE W. COOPER²
BRYAN ESSARY³
CHRIS J. TARDIO⁴
CHRISTOPHER A. VRETTOS
ALAN S. BEAN
JAMES C. SPERRING
JOSHUA R. ADKINS
KIM J. KINSLER⁵
RANDA VON KANEL
J. BLAKE CARTER⁶
MARK A. HAMMERVOLD¹
MATT H. CLINE
JOHN-MARK ZINI⁶

¹ LICENSED IN TN & FL
² LICENSED IN TN, AL & TX
³ LICENSED IN TN & GA
⁴ LICENSED IN TN & KY
⁵ LICENSED IN TN & WI
⁶ LICENSED IN TN & KS

CHRIS TARDIO
chris@gideoncooper.com

December 16, 2013

Via e-mail only: gerards@branstetterlaw.com

J. Gerard Stranch, IV
BRANSTETTER, STRANCH & JENNINGS
227 Second Avenue North
Nashville, TN 37201

Re: Documents Produced in State Court Cases

Dear Gerard:

At the status conference on December 13, 2013, you repeatedly represented to the Court that you did not have documents we previously produced in state court litigation.¹ We re-checked the file, and, as I thought, that is simply untrue. You have the document production. In fact, you sent us a CD containing the documents with the Requests for Admissions you propounded upon our clients in the MDL.

¹ Wayne A. Reed, individually and as husband and next of kin of decedent, Diana E. Reed, v. Saint Thomas Outpatient Neurosurgical Center, LLC, Howell Allen Clinic, a Professional Corporation, Saint Thomas Network, Saint Thomas Health, and St. Thomas Hospital, No. 13C417 (Davidson County Cir. Ct. voluntarily dismissed June 18, 2013); Frederick May and Loduska May v. Saint Thomas Outpatient Neurosurgical Center, LLC, Howell Allen Clinic, a Professional Corporation, and St. Thomas Hospital, No. 13C606 (Davidson County Cir. Ct. voluntarily dismissed June 18, 2013); May L. Parman v. Saint Thomas Outpatient Neurosurgical Center, LLC and Howell Allen Clinic, a Professional Corporation, No. 13C1005 (Davidson County Cir. Ct. voluntarily dismissed June 18, 2013); Virginia Neely, v. Saint Thomas Outpatient Neurosurgical Center, LLC, Howell Allen Clinic, a Professional Corporation, Saint Thomas Network, Saint Thomas Health, and St. Thomas Hospital, No. 13C1876 (Davidson County Cir. Ct. voluntarily dismissed June 18, 2013).

Mr. Stranch
December 16, 2013
Page 2

As we discussed during various meet and confers, we agree, for the purposes of the suits in the MDL, the documents previously produced in the *Reed, May, Parman*, and *Neely* cases are true and accurate copies for purposes of any document production in the MDL. We will be referring to these documents and incorporating them by reference in responses to the numerous requests for production you have sent in the MDL.

Pursuant Judge Saylor's directives on Friday, we will continue to wait for Judge Saylor (or Judge Boal) to put in place a discovery plan before we respond to your subpoena and/or discovery requests, and we will not file a motion for protective order (pursuant his suggestion), instead relying on the pending motion to stay, which he took under advisement.

If you believe you do not have all of the documents we previously produced, please let me know. You can also simply contact George Nolan, Bill Leader, and Doug Jones, counsel for the plaintiffs in the state court cases, which I am certain you have already done since you have the documents.

Please feel free to call if you would like to discuss further.

Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to be "CT" or "CJ" with a flourish.

Chris J. Tardio

CJT/mhc